

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION**

**IN RE: LOWRY FARMS, INC.
DEBTOR**

**CASE NO.: 1:24-bk-70535
CHAPTER 7**

**F & T LABOR CONSULTANTS, LLC'S RESPONSE TO MOTION FOR RULE 2004
EXAMINATION OF WARREN BANK & TRUST COMPANY AND
COMMERCIAL BANK, a/k/a FIRST STATE BANK**

Comes now F & T Labor Consultants, LLC, by and through its attorneys, Hashem Law Firm, PLC, and for its Response, states as follows:

1. That the Antonio-Benito, et al. Creditors, seek to subpoena records from Warren Bank & Trust Company and Commercial Bank, a/k/a First State Bank, account records regarding F & T Labor Consultants, LLC.
2. That any such production of the private banking records of F & T Labor Consultants, LLC, should be subject to an appropriate Protective Order limiting the dissemination of said records to the Counsel for the Antonio-Benito, et al. Creditors and attorneys for the Debtor.
3. That any production of banking records regarding F & T Labor Consultants, LLC, should also be required to be produced to Counsel for F & T Labor Consultants, LLC, Hani W. Hashem.

WHEREFORE, F & T Labor Consultants, LLC, prays that the Motion for Rule 2004 Examination of Warren Bank & Trust Company and Commercial Bank, a/k/a First State Bank, be denied; that in the alternative, a Protective Order be entered regarding the dissemination of F & T Labor Consultants, LLC private banking records; and that a copy of said records produced pursuant to Subpoena be provided to Counsel for F & T Labor Consultants, LLC; and for all other just and equitable relief to which it is entitled.

Respectfully submitted,

BY: /s/ HANI W. HASHEM
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CERTIFICATE OF SERVICE

I, Hani W. Hashem, attorney for F&T Labor Consultants, do hereby certify that a true and correct copy of the above and foregoing Notice of Appearance and Request for Notice has been *emailed Via ECF Electronic Delivery* to the following, and all creditors and parties of interest, on this 11th day of September, 2024:

James M. Knoepp
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/s/ HANI W. HASHEM
HANI W. HASHEM